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Presentation of the financial status and risk reporting system for supervised entities

Webinar 29.4.2026

Agenda

- **Opening of the session – Arttu Kiviniemi**
- **Update on the Reporting System – Arttu Kiviniemi**
- **Overview of proposals for simplification of supervisory reporting – Arttu Kiviniemi**
- **ITS changes and simplifications concerning supervisory reporting of credit institutions – Sinikka Taskinen, Marjo Risku, Deni Seitz**
- **Questions and Discussion**

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Update on the Reporting System

Update on the Reporting System

- The FIN-FSA's Reporting of financial standing and risks has been successfully transferred in its entirety to the Reporting Portal

- The reform of the Reporting System has concerned electronic, formal and regular reporting of financial standing and risks to the FIN-FSA
  - EBA ITS Data Collections (22)
  - EIOPA ITS data collections (10)
  - ESMA data collections (4)
  - National data collections (33)

- Identifying and authorizing Finnish and foreign reporters takes place via the Suomi.fi service

- The Reporter Portal is available for reporters' use
  - Up-to-date reporting obligation information is viewable
  - Submission of reports
  - Reporting-related communication

Report submission and feedback

- Reports can be submitted in three different ways
  - By uploading the report file (XBRL/XML/CSV) to the system
  - By submitting the report file directly from the reporter’s own system via an SFTP connection (Application to Application, A2A)
  - By completing web forms (recommended to use only for a small number of forms)
    - No web forms are planned for the CSDR7, CSDR9 and MMF data collections

- Each reporter sees in the Reporter Portal
  - Report Processing Status
  - Feedback on the report
    - Feedback from a report submitted via an SFTP connection also comes directly to the reporter's own reporting system

- Reporters may submit reports to the Validation service for checking before submitting an official report to the FIN-FSA
  - The reports are not used for supervisory purposes

Ongoing changes to reporting by credit institutions

- DPM 4.2 reporting requirements for Q1/2026 have been implemented in the Reporter's Portal and Validation Service (e.g. FINREP, COREP)
  - Other DPM 4.2 reporting forms will be published in stages as the reporting date approaches
  - For the reference date Q4/2025 (e.g. REM) reports are still submitted in the old format
- XBRLCSV reporting is available from reference date Q1/2026 as well as in updated reports.
  - Testing takes place in the validation service
  - Manual for Machine-Language Communication has been updated and is essential for reporters who provide data from their own systems
- Reporting under the Instant Payment Regulation (IPR) is included in the DPM 4.2 framework after technical corrections
  - The first reporting deadline was 9 April 2026 (reference periods 26 October 2022-31 December 2022, years 2023-2025)
- CR3/CRD6 New Operational Risk Reporting Obligations Reference Date 30 June 2026
  - For more information, see reporting bulletin 1/2026 - Timetable change in operational risk reporting requirements

Reporters should ensure that systems, processes and reporting practices are consistent with the updated DPM 4.2 reporting framework.

Reminder for Validation Feedback Review

- The Financial Supervisory Authority (FIN-FSA) has recently observed several deficiencies in the quality of the supervisory information regularly reported by supervised entities. If a supervised entity detects errors or inaccuracies in data already reported, they must be corrected without undue delay.

- The FIN-FSA reminds supervised entities of the obligation to regularly review the validation feedback of the automated quality assurance checks carried out in the reporting system, as well as the feedback reports of the European supervisory authorities.

- If the validation feedback contains warning- or error-level results, the necessary corrections should be made to the report with regard to format and authority checks or an explanation of the warning-level results should be provided to FIN-FSA.

Reminder to review validation feedback reports | EBA EIOPA ESMA National Reporting (Virati) - 2026 - www.finanssivalvonta.fi

Information on the reporting system and reporting obligations

- Information on the reporting system is available from the Financial Supervisory Authority (FIN-FSA) web pages.
- Reporting obligations by data collection finance sector and insurance sector data collection maps
- Contacts primarily through the Financial Supervisory Authority's Reporter's Portal
- Questions and feedback NewReportingSystem@finanssivalvonta.fi

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Overview of proposals for simplification of supervisory reporting

On complexity and simplification needs of supervisory reporting

- Strengthening Europe's competitiveness, including by simplifying regulation and reducing administrative burden, is strongly reflected in the European Commission's work programme
  - Targets include reducing reporting costs for companies by at least 25% and for SMEs by 35%.

- The complexity and overlaps of financial sector reporting requirements are the result of e.g.
  - a rapid and gradual increase in financial regulation,
  - the different mandates and objectives of the authorities that impose reporting obligations,
  - lack of coordination and exchange of information between collecting authorities; and
  - inconsistent definitions and data models of data to be reported

- Meaningful discussion of the reporting burden and its mitigation possibilities requires a holistic view of reporting requirements and appropriate metrics to assess reporting costs

EU financial market authorities' initiatives to simplify reporting

- ECB High-Level Task Force (HLTF) recommendations on simplifying banking regulation, supervision and reporting
  - ECB Banking Supervision proposals to enhance effectiveness, efficiency and risk-based supervision
- EBA proposals to enhance the efficiency of the regulatory and supervisory framework for banks and concrete simplification proposals for EBA reporting
- EIOPA proposals to simplify Solvency II reporting for insurance companies and discussion paper on integrated data collection
- ESMA discussion paper on the harmonisation of fund reporting and an integrated reporting framework

ECB High Level Group (HLTF) reporting recommendations

- **Increased exchange of information between authorities and a coordination mechanism for new reporting requirements (”request once”)**
  - Promoting supervisory data sharing to reduce duplicative reporting requirements
  - Common rules of the game and coordination between authorities when setting new reporting requirements - data collections should be necessary, proportionate and well-designed

- **Development of an integrated reporting system (”report once”)**
  - Long-term vision for developing a reporting system that meets the data needs of supervisors, central banks and resolution authorities

- **Non-correction of minor reporting errors (”resubmit less”)**
  - Mandate for EBA to define materiality thresholds for minor reporting errors

- **Comprehensive and regularly published repository of reporting requirements (”more transparency”)**
  - Obligation for reporting authorities to regularly publish a common list of (non-market-sensitive) reporting requirements for banks including possible extensions to non-SSM EU countries, resolution data collections and data collections for other financial sectors

- **Regular review of the timeliness and relevance of the current reporting requirements (”review regularly”)**
  - Obligation for supervisory authorities to regularly assess the necessity and timeliness of existing reporting requirements on the basis of common and harmonised criteria

- **Alignment of supervisory reporting and public disclosure requirements and elimination of double reporting (”reform public disclosure”)**
  - Mandate for EBA to derive Pillar 3 disclosures from supervisory reporting for all banks, termination of separate publications

Other EU authorities' proposals to simplify bank reporting broadly aligned

- The proposals for simplifying reporting published by the EBA on 1 October 2025 are similar to the ECB's HLTF recommendations
  - The longer-term goal is an integrated reporting framework meeting the data needs of different authorities
  - In the short term, the goal is to reduce reporting costs by at least 25% (burden reduction, better transparency, common rules of the game, improved and more predictable change management)
  - ➢ The first phase of practical implementation of the recommendations published on 10 April 2026 (see the next section of the webinar)

- ECB Banking Supervision proposals are largely consistent, including:
  - Reducing the ECB's own additional reporting requirements for banking supervision

EIOPA's simplification proposals for insurance reporting

- In 2025, EIOPA launched consultations on Solvency II reporting changes in non-life and life insurance companies, with the aim of reducing the reporting burden at the same time.
  - Stakeholders were able to submit comments to EIOPA on 10.7.-10.10.2025.
  - Post-public consultation event for stakeholders on 3 February 2026.

- The revision of the reporting requirements was originally triggered by changes to the Solvency II Directive. At the same time, the revision provided an opportunity to explore ways to reduce the reporting burden on insurance companies in line with the Commission's objectives.

- EIOPA has approved, for its part, the draft ITS on supervisory reporting and the amendments have been submitted to the European Commission.

- The version of Solvency II taxonomy to be used has yet to be confirmed for the reporting reference date of 31 December 2026.

EIOPA’s Discussion Paper on Integrated Data Collection

- EIOPA published a discussion paper on integrated data collection on 13 March 2026
  - Discussion Paper for EIOPA's report on integrated data collection - European Insurance and Occupational Pensions Authority

- The purpose of integrated reporting is to improve the efficiency of reporting by insurance companies and pension funds, and the initiative aims to reduce duplication of reporting and streamline reporting processes in line with the requirements of the amended Solvency II Directive.

- EIOPA has launched a public consultation to receive feedback from stakeholders on potential inefficiencies, duplications and inconsistencies identified in regulatory reporting and disclosure requirements and on possible solutions to address these issues.
  - Stakeholders are asked to respond to the questionnaire by 10 June 2026 at the latest.

- The responses received will serve as a basis for the work of EIOPA, which will result in a final report to the European Commission.
  - The final report must be submitted to the Commission by 29 January 2027.

ESMA's discussion paper on the harmonisation of fund reporting

- Options for harmonisation and consolidation of fund reporting under consideration at ESMA - AIFMD and UCITS Directives include mandate for ESMA to prepare a report to the Commission on the development of an integrated reporting system

- ESMA published a discussion paper on upcoming AIFMD II and UCITS data collections in the summer of 2025: Discussion Paper on the integrated collection of funds' data
  - The consultation includes a comprehensive set of questions on both reporting process (overlaps, data collection integration) and more technical details (reporting format, frequency, content issues)

- ESMA is due to submit an interim report to the Commission on the development of reporting during the spring of 2026 – draft technical standard for reporting by 16 April 2027

FIN-FSA views on the proposals

- Simplification of reporting is supported without compromising supervisory objectives – a holistic view of the reporting burden and appropriate metrics to assess it are key

- In the long term, an integrated reporting framework that meets the data needs of different authorities has the most significant potential for simplifying and enhancing reporting
  - As key principles, defining concepts in a uniform way (‘define once’) and reporting the same information only once (‘report once’)

- Currently, the progress on integration of reporting requirements mainly sector-specific; close cooperation among ESAs and other authorities is essential to ensure consistency and scalability of the solutions

- FIN-FSA encourages supervised entities to respond to consultations and highlight key inefficiencies in reporting requirements and the drivers of reporting costs

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ITS amendments and simplifications for supervisory reporting of credit institutions

The consultation paper covers not only the simplification activities but also the reporting change needs due to regulatory changes and supervisory needs

Towards a cost-effective and predictable reporting framework

A wide range of reporting simplification measures:

- Reduction of data points and templates
- Reduced frequency and scope adjustments
- Introducing greater proportionality for SNCIs
- Streamlining of separate data collections
- Integration of national reporting into harmonised ITS reporting

Improvements to the reporting change management practices

- Reporting changes more predictable and improvements to the communication practices
- Timing difference between the regulatory requirements and the start of reporting

The consultation paper consists of 9 separate "mini-consultations"

Timeline

- Consultation response time ends 10.7.2026
  - Exception: IFRS 18-affected Finrep templates with earlier deadline 10.5.2026
- First reporting under the revised framework is expected for the reference date of 30.9.2027
  - Technical package draft Q4 2026
- Earlier reporting for Finrep IFRS 18-affected templates is expected for the reference date of 31.3.2027
  - EBA decision expected in July and draft technical package in September

=> To assess the achievement of the cost savings target, the EBA needs industry feedback on key cost drivers for reporting

FINREP

Amendments of Finrep reporting

- Regulatory changes, evolved supervisory data needs, the Q&A mechanism, and simplified reporting to reduce reporting costs.

- Behind the simplification proposals are the 2021 EBA Study of Cost of Compliance and feedback from the data users.

- Proposed Simplification Measures:
  - Deleting templates
  - Restructuring some details, especially in NPL templates
  - Reducing the frequencies
  - Increasing proportionality for SNCIs and introduction of thresholds

IFRS 18 changes the structure of statement of profit or loss

- IFRS 18 requires the classification of income and expenses into operating, investing, and financing categories
- If the main business activity is providing financing to customers and investing in financial assets (IFRS 18, 49) => income and expenses related to the main business activities (operating category)
- The starting point for the proposed Finrep changes is in line with the Illustrative Example (IFRS 18, IE 13)
- Proposed changes to the Finrep templates:
  - F02.00, F16.01, F16.02, F16.03, F16.04, F16.04.1, F16.05, F16.06, F16.07, F20.03, F45.03
  - New subtotals for the profit and loss account
  - Some income and expenses moved in the investing category
  - In the breakdown tables columns for the new categories added
- More detailed reporting guidance on reporting IFRS 18 affected templates in the EBA decision

Other changes to Finrep reporting

- Collateral F13.01.1, F13.01.2, F18.02, F37.00 and F48.00
  - Deficiencies in the quality and comparability of collateral-related data identified
  - New information, e.g. on the valuation of collateral
- Non-bank financial intermediaries (NBFI) F27.01, F27.02, F27.03
  - Examining the interconnectedness between the NBFI and the banking sector requires more accurate data than at present
  - The new tables are based on current definitions (counterparty sector other financial corporations)
  - Threshold report
- Crypto -assets F38.00 and new rows F22.01 and F22.02
  - New semi-annually reported template, crypto assets by accounting portfolios (financial instrument vs. intangible asset)
- Other minor changes/specifications e.g. Q&A based on responses

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Liquidity reporting

Key reform proposals for liquidity reporting

- Consolidation and harmonisation of liquidity reporting in the EU/EEA
  - National regular data collections will be integrated into the ITS framework, improving comparability and reducing duplication.
- Orientation of reporting to behaviours and concentrations
  - Instead of contractual maturities, the focus is shifted to the actual behaviour of financing and balance sheet items, as well as the dependencies and concentration risks of funding sources.
- Reduction of rarely used reporting and clarification of reporting guidelines
  - In supervision, reporting that has been found to be of minor importance is reduced and the instructions are specified, for example, by adding earlier Q&A interpretations directly to the reporting instructions.
- Better targeting of reporting for supervisory and resolution needs
  - The same liquidity data supports both supervision and resolution more effectively, strengthening responsiveness to rapidly changing risks.
- Same data available for more frequent reporting if needed
  - Harmonized data enables a flexible transition to more frequent reporting according to control requirements and reduces the need for separate national ad hoc collections.

Content Modifications for ALMM Reporting C66

- The granularity is increased to a daily level for the 7–14 days time bucket.
- Initial stock reporting will also be extended to include inflows and outflows, and reporting criteria will be specified.
- The reporting of Open Maturity items is expanded and specified to distinguish open maturity items from actual overnight transactions.
- The key risk drivers of the financial structure are more clearly identified (e.g. excess operational deposits, deposits on online platforms, intra-group foreign exchange swaps, and transferable investment and commercial paper).
- Contingencies and downgrade trigger reporting will be clarified and harmonised.
- New C 66.02 behaviour-based maturity ladder for large institutions.
- The guidelines will be amended to allow CBC to include proprietary issues that are central bank eligible and issued by another member of the group.

Content modification proposals for ALMM reporting C67 / C68 / C69 / C71

- C 67 — Concentration of funding by counterparty
  - Reporting is extended by large institutions to top 30 largest counterparties (separate C67.01 form).
  - The 1% reporting threshold is removed.
  - The breakdown of counterparty sectors is specified by breaking down “Other financial corporations” into several sub-groups.
  - Product type classification will be clarified and intra-group financing will be reported in a separate column.
- C 68 Concentration of funding by product type
  - The granularity of retail deposits will be increased: a more detailed breakdown for retail customers' fixed-term deposits and a breakdown by size of deposits.
  - The intragroup/IPS funding column is added and AT1 and T2 instruments are included.
  - Central bank funding is included in reporting
- C 69 and C 71
  - C 69: In the pricing of funding, the spread-to-interest rate is shifted and key instruments are separated.
  - C 71: Replace current value with post-haircut value.
  - SNCIs are exempted from C 71 reporting and medium-sized institutions are exempted from C 69 reporting.

Main proposals for amendments Asset Encumbrance (AE) - for reporting

- The concepts are aligned with ALMM and LCR reporting.
- Emphasis from an accounting perspective on liquidity risk assessment and asset mobilization capability.
- Other changes
  - **Structure:** F 32.01 and F 32.02 tables are replaced by new F 32.11 and F 32.12, F36 is updated accordingly and partly overlapping forms (F 32.03 and F 34.00 are deleted).
  - **Collateral and assets classification**: In the future, the burden on collateral pools will be allocated in the order of liquidity in accordance with LCR DR.
  - **Visibility for mobilization capacity:** distinguishing between marketable and non-marketable assets, distinguishing e.g. bonds, central bank deposits, covered bonds and securitisations
  - **Liquidity potential:** new information on post-haircut value, central bank eligibility, pre-positioned collateral and non-eligible and unknown eligibility items.
  - **Additional exposure to risks**: unrealised gains and losses in collateral pools are reported.

Stress tests

Reporting changes related to stress testing (Consultation module 4)

- **What?** Selected EU-wide stress test starting-point data needs will be integrated into regular supervisory reporting:
  - **Credit risk:** F49.01 (parameters), F49.02 (balances), D01.00 (ESG), C09.05 (IRB)
  - **Market risk:** F50.00 (sensitivities) and targeted amendments to F16.03, C25.01 and C32.02
  - **Other:** e.g., F16.08 and F44.04
- **Why?** Impact assessment indicates an overall reduction in stress test data requirements of ~55% (vs. 2025), alongside lower reconciliation costs between stress test data and supervisory reporting.
- **Who?** Mainly large banks (total assets > EUR 30bn); however, F49.02 is requested for the FINREP sample excluding SNCIs.
- **When?** For the 2027 stress test, templates will mimic the proposed FINREP/COREP/ESG reporting changes. The actual integration of starting-point data into regular reporting is intended to apply from the 2029 stress test onwards.
- **Other points to note?**
  - The details of the 2027 stress test exercise will be further specified in a separate consultation.
  - The CP seeks stakeholders' views on collecting historical information for F49.02 via an ad hoc data collection.

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Other changes

ESG reporting as part of supervisory reporting

- In addition to Pillar 3 data, other sustainability regulations have been taken into account in the development of the ESG risk reporting framework to minimise overlaps
- Certain ESG tables cover data removed from Finrep reporting and serve the data needs of EU stress tests
- Three sets of templates
  - Large institutions 7 templates semi-annually / annually
  - Other listed institutions 6 templates annually
  - SNCIs 1 template annually

- New templates
  - D04.00 concentration risk — predefined sectors listed in the instructions
  - D11.00 Exposures to Environmental Risks (Beyond climate)

- The current ad-hoc data collection will be discontinued after the new framework applies

Operational risks losses reporting

- The new operational risk loss classification (taxonomy) is expected to become applicable during 2026 when the Commission adopts draft regulatory technical standards RTS/2025/03
- The current tables C17.01 and C17.02 are not aligned with the new regulation (CRR 3 and taxonomy)

- New C17.01 (Operational loss events) granular data reported semiannually

- Transitional arrangements (gap between RTS and ITS starts to apply) => EBA decision
  - Keeping current reporting templates
  - Only Level 1 event types are reported
- When ITS enters into force, loss events are reported retroactively from time when the RTS starts to apply

- C17.02 one-off reporting of historical losses is expected from the supervised entities with BI > €750 million

=> to be implemented by decision of EBA, not to become part of ITS

Other proposed changes e.g. CRR3 driven amendments

- CRR 3 driven amendments e.g.
  - Corep LE new table C37.00 shadow banking exposures at aggregate level
  - Corep LR reducing the reporting burden
  - Corep OF new table C05.03 of CRR 3 transitional arrangements + other minor refinements to OF module

- Other proposed changes to the Corep tables, market risks
  - Renewed market risk framework FRTB to be introduced at the beginning of 2027
  - Structural Foreign Exchange Position — new table
  - The industry feedback is mainly sought on the proposed simplification measures

- Supervisory Benchmarking parallel consultation ongoing
  - Benchmarking tables CR and IFRS 9 are proposed to integrate into the ITS on supervisory reporting
  - Simplification proposals reduce reporting burden and bring better cross usage of data

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Questions

Contacts and further information

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Thank You - the session has ended